

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-24191-CIV-SCOLA

VICTOR ARIZA,

Plaintiff,

v.

KARELA KIDS LLC,

Defendant.

JOINT NOTICE OF SETTLEMENT

Pursuant to Local Rule 16.4, Plaintiff, VICTOR ARIZA, and Defendant, KARELA KIDS LLC, by and through their undersigned counsel, hereby notify the Court that the parties have reached a resolution in principal of all claims in this case and fully addressing Defendant's website (www.karelakids.com) meeting the accessibility standards required by the Americans With Disabilities Act ("ADA"), as applicable, for the blind or visually impaired by using the standards of the Worldwide Web Consortium's ("W3C") Web Content Accessibility Guidelines ("WCAG") 2.1 as a guideline, to be implemented within a reasonable timeline agreed upon by the parties. The settlement will address not only Plaintiff's claims in this case, but also future claims concerning Defendant's website's alleged noncompliance with the ADA or WCAG, and Defendant will provide general information about the settlement to counsel for possible claimants who contact its undersigned counsel in order to avoid future needless litigation on similar grounds. The parties intend to finalize their settlement and file a stipulation of dismissal within forty-five (45) days and request a stay of the proceedings and deadlines, or the administrative closure of this matter, for forty-five days.

Joint Notice of Settlement
Case No. 22-24191-CIV-SCOLA

WHEREFORE, Plaintiff, Victor Ariza, and Defendant, Karela Kids LLC, request that the Court accept this Notice of Settlement reached by them and that the Court stay all proceedings and deadlines in this case, or the administrative close this case, for forty-five days so that the parties may finalize their settlement and dismiss this case with prejudice, and request such other and further relief as the Court deems just and proper.

Dated: February 10, 2023

Respectfully submitted,

s/ Roderick V. Hannah
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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and served a copy on Martha R. Mora, Esq. (mmora@avilalaw.com), Avila Rodriguez Hernandez Mena & Garro LLP, 2525 Ponce de Leon Blvd., Suite 1225, Coral Gables, FL 33134, *Counsel for Defendant Karela Kids LLC*.

/s _____
RODERICK V. HANNAH